

**TRENK, DiPASQUALE, WEBSTER,
DELLA FERA & SODONO, P.C.**

347 Mt. Pleasant Avenue, Suite 300

West Orange, New Jersey 07052

(973) 243-8600

Joseph J. DiPasquale (JD3330)

Thomas M. Walsh (TW0645)

Michele M. Dudas (MD5029)

Counsel to Mantiff-Jahnavi Zanesville

Hospitality, LLC, Chapter 11 Debtor

and Debtor-in-Possession

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:

MANTIFF-JAHNAVI ZANESVILLE
HOSPITALITY, LLC,

Debtor.

Chapter 11

Case No. 08-26040 (NLW)

**NOTICE OF MOTION PURSUANT TO 11 U.S.C. § 1121(d) TO EXTEND
THE TIME PERIOD IN WHICH THE DEBTOR HAS THE EXCLUSIVE
RIGHT TO FILE A PLAN OF REORGANIZATION AND TO EXTEND
THE TIME PERIOD IN WHICH THE DEBTOR HAS THE EXCLUSIVE
RIGHT TO SOLICIT ACCEPTANCE OF ITS PLAN OF
REORGANIZATION**

PLEASE TAKE NOTICE that on **September 8, 2009, at 10:00 a.m.**, or as soon thereafter as counsel may be heard, the undersigned counsel for Mantiff-Jahnavi Zanesville Hospitality, LLC, Chapter 11 debtor and debtor-in-possession (the “Debtor” or “Mantiff”) shall move before the Honorable Novalyn L. Winfield, United States Bankruptcy Judge, in the United States Bankruptcy Court, M.L. King Federal Building, 50 Walnut Street, Third Floor, Newark, New Jersey, for the entry of an Order (i) extending the time period in which the Debtor has the exclusive right to file a plan of reorganization, (ii) extending the time period in which the Debtor

has the exclusive right to solicit acceptance of its plan of reorganization, and (iii) for such other relief as this Court deems just and equitable (the “Motion”).

PLEASE TAKE FURTHER NOTICE that in support of the Motion the Debtor shall rely upon the Verified Application submitted concurrently herewith. Also enclosed is a proposed form of Order. The Debtor submits that no separate memorandum of law is necessary because the applicable law is adequately set forth in the supporting Application.

PLEASE TAKE FURTHER NOTICE that any objections to the relief requested by the Debtor shall (i) be in writing; (ii) specify with particularity the basis of the objections; and (iii) be filed with the Clerk of the United States Bankruptcy Court, electronically by attorneys who regularly practice before the Bankruptcy Court in accordance with the General Order Regarding Electronic Means for Filing, Signing, and Verification of Documents, dated March 27, 2002 (the “General Order”) and the Commentary Supplementing Administrative Procedures, dated as of March 2004 (the “Supplemental Commentary”) (the General Order, Supplemental Commentary and the User’s Manual for the Electronic Case Filing System can be found at www.njb.uscourts.gov, the official website for the Bankruptcy Court), and by paper copy by all other parties-in-interest, and shall be simultaneously served on Trenk, DiPasquale, Webster, Della Fera & Sodono, P.C., 347 Mount Pleasant Avenue, Suite 300, West Orange, New Jersey 07052 (Attention: Joseph J. DiPasquale, Esq.). Pursuant to D.N.J. LBR 9013-1(d), any opposition to the Motion must be filed and served at least seven (7) days before the above-mentioned hearing date.

PLEASE TAKE FURTHER NOTICE that the Debtor waives oral argument on the Motion unless opposition thereto is filed.

**TRENK, DiPASQUALE, WEBSTER,
DELLA FERA & SODONO, P.C.**
*Attorneys for Mantiff-Jahnavi Zanesville
Hospitality, LLC, Chapter 11 Debtor and
Debtor-in-Possession*

Dated: August 19, 2009

By: /s/ Joseph J. DiPasquale
JOSEPH J. DiPASQUALE

F:\WPDOCS\A-M\Mantiff Jahnavi Zanesville Hospitality LLC (Ramada Inn)\EXCLUSIVITY - Notice of Motion4.doc